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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers
12 Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust
13 2005-2*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST
17 COMPANY, FORMERLY KNOWN AS
18 BANKERS TRUST COMPANY OF
19 CALIFORNIA, N.A., AS TRUSTEE FOR
20 AMERICAN HOME MORTGAGE
21 INVESTMENT TRUST 2005-2,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; FIDELITY NATIONAL TITLE
INDIVIDUALS I through X; and ROE
26 CORPORATION XI through XX, inclusive,

27 Defendants.

28 Case No.: 2:20-cv-01885-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S
OPPOSITION TO COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF No. 36]**

[First Request]

29 Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust
30 Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-
31 2 (“Deutsche Bank”) and Defendant, Commonwealth Land Title Insurance Company
32 (“Commonwealth”), by and through their attorneys of record, hereby stipulate and agree as
33 follows:
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1. On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-20-821781-C [ECF No. 1-1];
 2. On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF No. 1];
 3. On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
 4. On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's Motion to Dismiss and Counter motion for Partial Summary Judgment [ECF Nos. 24 and 25];
 5. On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to Dismiss and Opposition to Counter motion for Partial Summary Judgment [ECF No. 36];
 6. Deutsche Bank contends that it is entitled to file a response to Commonwealth's Opposition to its Counter motion for Partial Summary Judgment and that its deadline to do so is January 4, 2021;
 7. Deutsche Bank's counsel is requesting a brief, one-week extension to respond to Commonwealth's Opposition, until January 11, 2021;
 8. This extension is requested to allow counsel for Deutsche Bank additional time to review and respond to the points and authorities cited to in the pending Opposition;
 9. Counsel for Commonwealth does not oppose the requested extension to the extent that a response is permitted;

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1 10. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 31st day of December, 2020.

5 WRIGHT, FINLAY & ZAK, LLP

6 */s/ Lindsay D. Robbins*

7 Lindsay D. Robbins, Esq.
8 Nevada Bar No. 13474
9 7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
10 *Attorneys for Plaintiff, Deutsche Bank*
11 *National Trust Company, Formerly Known as*
12 *Bankers Trust Company of California, N.A.,*
13 *as Trustee for American Home Mortgage*
14 *Investment Trust 2005-2*

DATED this 31st day of December, 2020.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair

Kevin S. Sinclair, Esq.
Nevada Bar No. 12277
16501 Venture Blvd., Suite 400
Encino, CA 91436
Attorneys for Defendants, Commonwealth
Land Title Insurance Company, Fidelity
National Title Group, Inc., and Fidelity
National Title Insurance Company

13 **IT IS SO ORDERED.**

14 DATED this 4th day of January, 2021.

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UNITED STATES DISTRICT JUDGE

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